

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

Proceeding by the Department on its own Motion to)
Implement the Requirements of the Federal)
Communications Commission's Triennial Review)
Order Regarding Switching for Mass Market)
Customers)

D.T.E. 03-60

**VERIZON MASSACHUSETTS
FIRST SET OF INFORMATION REQUESTS TO AT&T**

Verizon New England Telephone Inc. d/b/a Verizon Massachusetts ("Verizon MA") requests that AT&T Communications of New England, Inc. ("AT&T") respond to the following information requests. In the event responses to all or part of these requests will not be forthcoming in the time period established for this proceeding by the Department of Telecommunications and Energy ("Department"), kindly notify Verizon MA as soon as possible.

These requests shall be deemed continuing so as to require further and supplemental responses if AT&T or its witnesses receive or generate additional information within the scope of these requests between the time of the original responses and the end of hearings in this proceeding.

If AT&T feels that any request is ambiguous, please notify Verizon MA so that the request may be clarified prior to the preparation of a written response.

DEFINITIONS AND INSTRUCTIONS

1. With respect to each question, please state: (1) the name(s) and title(s) of the person or persons responsible for preparing the response; (2) the name(s) and title(s) of the person or persons who would be competent to testify concerning the response, whether or not that person will be called as part of the party's direct case in this proceeding.

2. In these Information Requests, "AT&T" means AT&T Communications of New England, Inc., and its respective parents, subsidiaries, affiliates, agents, servants, attorneys, investigators, employees, ex-employees, consultants, representatives and others who are in possession of, or who may have obtained information for or on behalf of any of the above mentioned persons or entities.

3. "Verizon" means Verizon New England Inc. d/b/a Verizon Massachusetts.

4. If AT&T cannot answer a request in full, answer to the extent possible and state why it cannot answer the request in full.

5. If AT&T refuses to respond to any request by reason of a claim of privilege, state the privilege claimed and the facts relied upon to support the claim of privilege.

6. Please serve a copy of the responses to these requests on Verizon MA's attorney, Bruce P. Beausejour, 185 Franklin Street, 13th Floor, Boston, Massachusetts 02110-1585. Please make every effort to expedite delivery of responses to these requests, including email, shipping by Express Mail, UPS, Federal Express, Purolator Courier, or means of equal or greater speed.

INFORMATION REQUESTS

1. For each Verizon wire center listed on the attached spreadsheet (which may be used to respond to this question), please:
 - a) Identify all of the optical terminating/multiplexing equipment (including manufacturer and model) that AT&T has deployed at that wire center;
 - b) Provide the number of fibers placed between the optical equipment identified in part (a) above and the AT&T termination point of the fiber (e.g., an AT&T WC, POP, Node, or CLEC Hotel);
 - c) Provide the CLLI, name and postal address of the AT&T terminating location; and
 - d) Identify the optical terminating/multiplexing equipment (including manufacturer and model) that AT&T has deployed at the terminating location.
2. For each specific address shown in Exhibit 4 to Verizon MA's Supplemental Panel Testimony filed on December 19, 2003 and identified therein as being a location where AT&T has either self provisioned DS3 services or is a Dark Fiber provider please provide the following information:
 - a) A description of the optical terminating/multiplexing equipment (including manufacturer and model) that AT&T has deployed at that address;
 - b) The number of DS3 services that AT&T has provisioned at that address;
 - c) The originating location (e.g. collocation at a Verizon MA wire center or if other than a Verizon wire center, the AT&T POP, Node, CLEC Hotel etc.) of the DS3 services identified in (b) above. This location information should consist of the name of the location, physical address and CLLI code; and

- d) A description of the optical terminating/multiplexing equipment (including manufacturer and model) that AT&T has deployed at the originating locations identified in (c) above.